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November 29, 2017

Hon. Cathy Waldor, U.S.M.J.
MLK Jr. Federal Bldg. & Courthouse - Room 4040
50 Walnut St.
Newark, NJ 07102

SOUTH NEW JERSEY OFFICE:*
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Re: Carlos Sanchez v. CSX International Terminals Inc., et al
Our File Number: EJM / 42800.5-00008
Docket Number: 2:15-CV-03497-KSH-CLW

PHILADELPHIA OFFICE:*
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Dear Judge Waldor:

Our office represents the defendant, CSX Intermodal Terminals, Inc. ("CSX"), in the above-captioned matter. At the last Case Management Conference, held on October 5, 2017, Your Honor extended the time for the plaintiff to serve his liability expert report. Accordingly, the plaintiff was permitted to serve his expert report by September 29th and the defendants to serve their expert reports by November 20th. The defendants received the plaintiff's two separate liability expert reports on September 25th and September 27th respectively. Due to the defense expert's schedule, the defense requires additional time for serving its liability expert report. We have contacted the plaintiff's and the co-defendant's counsel, and they have both consented to an extension. Given the holiday schedule, we respectfully request that the defense be given until January 15, 2018, to serve the expert report. The current scheduled completion of discovery is January

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30, 2018, and the extension should not adversely affect, nor delay the current discovery end date.

We thank you in advance for your kind consideration and courtesies.

Respectfully submitted,

MARGOLIS EDELSTEIN

By: 

EMERY J. MISHKY, ESQ.

EJM: nao

cc: Mitchell D. Perlmutter, Esq.
Robert A. Suarez, Esq.

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